

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

EVA WILLIAMS,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION NO:
)	1:06-CV-387-CSC
GREATER GEORGIA LIFE)	
INSURANCE COMPANY,)	
)	
DEFENDANT.)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to FRCP Rule 26(f), a meeting was held on June 26, 2006, between Samuel Adams, attorney for plaintiff, and Michael Lucas, attorney for defendant.

2. Pre-discovery Disclosures.

The parties will exchange the information required by Rule 26(a)(1) by July 21, 2006.

3. Discovery Plan.

The parties jointly propose to the court the following discovery plan:

Without waiver of objections to any area of discovery or the need for any discovery at all, discovery may be needed on the following subjects:

Plaintiff's complaint, plaintiff's employment history and background, plaintiff's alleged disability; defendant's defenses, plaintiff's damages, mitigation of damages.

All discovery must be commenced in time to be completed by November 30, 2006.

Maximum of 20 interrogatories, including sub-parts, by each party. Responses due 30 days after service.

Maximum of 20 requests for admissions, including sub-parts, by each party. Responses due 30 days after service.

Maximum of 40 requests for production of documents, including sub-parts, by each party. Responses due 30 days after service.

Maximum of 5 depositions by each party. No deposition shall exceed eight hours unless agreed to by the parties or ordered by the Court.

Reports from retained experts, if any, under Rule 26(a)(2) are due:

From plaintiff by August 31, 2006.

From defendant by October 13, 2006.

Supplementation under Rule 26(e) due by October 13, 2006.

4. Other Items.

A scheduling conference is not requested prior to entry of a scheduling order.

Plaintiff has until July 14, 2006 to join additional parties and to amend the pleadings.

Defendant has until August 15, 2006 to join additional parties and to amend the pleadings.

All potentially dispositive motions must be filed and served by December 22, 2006.

Settlement cannot be evaluated until completion of initial discovery.

The parties will determine whether mediation should be entered upon completion of initial discovery.

Final lists of trial evidence under Rule 26(a)(3) are due 30 days before trial.

Parties have 10 days after service of final lists of trial evidence to state objections under Rule 26(a)(3).

The case will be ready for trial after January, 2007 and is expected to take approximately 2 days.

Dated: June 29, 2006.

s/Samuel L. Adams
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Attorney for Plaintiff

s/ Michael L. Lucas
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